

J. RANDALL ANDRADA, SBN 70000
randrada@andradalaw.com
LYNNE G. STOCKER, SBN 130333
lstocker@andradalaw.com
ANDRADA & ASSOCIATES
PROFESSIONAL CORPORATION
1939 Harrison Street, Suite 612
Oakland, California 94612
Tel.: (510) 287-4160 / Fax: (510) 287-4161

Attorneys for Defendant
L. SILVA

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

FRESNO DIVISION

DORA SOLARES,

Plaintiff,

v.

RALPH DIAZ, et al.,

Defendants.

Case No.: 1:20-CV-00323-LHR-BAM

**DEFENDANT SILVA'S NOTICE AND
PRIVILEGE LOG RE: PLAINTIFF'S
SUBPOENA DIRECTED TO THE
OFFICE OF THE INSPECTOR
GENERAL**

Date: June 24, 2025
Time: 11:00 a.m. (PDT)
Courtroom: Videoconference
Judge: Hon. Lee H. Rosenthal

On May 23, 2025, the Court ordered non-party California Department of Corrections and Rehabilitation (CDCR) to review documents gathered by the California Office of the Attorney General (OIG) in response to a subpoena issued by Plaintiff in this matter and to provide a privilege log as to documents generated by CDCR. (Minute Order, ECF No. 162.) Defendant Silva hereby asserts privileges and other grounds for withholding documents potentially responsive to the subpoena as set forth in the attached privilege log.

Defendant Silva further notes that OIG's access to the documents listed in the attached privilege log does not result in a waiver of privilege. By statute, CDCR (and its employees) is required to allow access to its documents, but allowing that access does "not result in the waiver of

any confidentiality or privilege regarding any records or property." Cal. Penal Code § 6126.5.

Dated: June 23, 2025

ANDRADA & ASSOCIATES

/s/ Lynne G. Stocker

By _____
LYNNE G. STOCKER
Attorneys for Defendant SILVA

ANDRADA & ASSOCIATES
PROFESSIONAL CORPORATION

Solares v. Diaz, et al.
U.S.D.C. for the Eastern District of California
Case No. 1:20-cv-00323-LHR

Defendant L. Silva's Privilege Log
In Response to Plaintiff's Subpoena to the Office of Inspector General

Date of Document	Document Description	Identity and Position of Authors and/or Recipients	Grounds for Withholding Documents
07/16/20	Appellant Silva's Second Amended Pre-Hearing Settlement Conference Statement; Good Cause Declaration of Baz Vannorsdall in Support of Second Amended Pre-Hearing Settlement Conference Statement	Baz Vannorsdall Staff Legal Counsel California Correctional Peace Officers Assoc.	Attorney Work Product; FRCP 26(a)(2)(D); FRCP 26(b)(3) (A) and (B); FRCP 26(b)(4); FRCP 26(b)(2)(C)(iii); Confidential; Beyond Scope of Permissible Discovery
July 2020	Curriculum Vitae and Bibliography of Silva's consulting expert	Baz Vannorsdall Staff Legal Counsel California Correctional Peace Officers Assoc.	Attorney Work Product; FRCP 26(a)(2)(D); FRCP 26(b)(3) (A) and (B); FRCP 26(b)(4); FRCP 26(b)(2)(C)(iii); Confidential; Beyond Scope of Permissible Discovery
8/3/20	Appellant Silva's Response to Respondent's Opposition to Silva's Second Amended Request to Amend Silva's Pre-Hearing Settlement Conference Statement	Baz Vannorsdall Staff Legal Counsel California Correctional Peace Officers Assoc.	Attorney Work Product; FRCP 26(a)(2)(D); FRCP 26(b)(3) (A) and (B); FRCP 26(b)(4); FRCP 26(b)(2)(C)(iii); Confidential; Beyond Scope of Permissible Discovery

8/7/20	Appellant Silva's Motion to Continue Evidentiary Hearing; Declaration of Cadee Ohanesian in Support thereof	Cadee Ohanesian Staff Legal Counsel California Correctional Peace Officers Assoc.	Attorney Work Product; FRCP 26(a)(2)(D); FRCP 26(b)(3) (A) and (B); FRCP 26(b)(4); FRCP 26(b)(2)(C)(iii); Confidential; Beyond Scope of Permissible Discovery
8/14/20	Order on Appellant's First Amended and Second Amended Pre-Hearing Settlement Conference Statements	Mark R. Kruger Presiding Administrative Law Judge State Personnel Board Cadee Ohanesian Staff Legal Counsel California Correctional Peace Officers Assoc.	Attorney Work Product; FRCP 26(a)(2)(D); FRCP 26(b)(3) (A) and (B); FRCP 26(b)(4); FRCP 26(b)(2)(C)(iii); Confidential; Beyond Scope of Permissible Discovery